

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION,  
OPIATE LITIGATION

MDL NO. 2804

Case No. 17-MD-2804

Judge Dan Aaron Polster

THIS DOCUMENT RELATES TO:

*Rees v. McKesson Corporation, et al.*  
MDL Case #1:18-OP-45252

*Ellis v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45464

*Simonson v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45479

*Wood v. Purdue Pharma L.P., et al.*  
MDL Case #1:18-OP-45264

*DeMaro v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45465

*Delancey v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45480

*Salmons v. Purdue Pharma L.P., et al.*  
MDL Case #1:18-OP-45268;

*Cruz v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45466

*Stewart v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45481

*Ambrosio v. Purdue Pharma L.P., et al.*  
MDL Case #1:18-OP-45375

*Paul v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45467

*Shewmake v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45482

*Flanagan v. Purdue Pharma L.P., et al.*  
MDL Case #1:18-OP-45405

*Lechuga v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45468

*Weatherwax v. Purdue Pharma, LP., et al.*  
MDL Case No. #1:19-op-45483

*Whittley v. Purdue Pharma LP., et al.*  
MDL Case #1:18-OP-45598

*Brumbarger v. Purdue Pharma, LP., et al.*  
MDL Case No. #1:19-op-45469

*Martinez v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45484

*Roach v. McKesson Corporation, et al.*  
MDL Case No. #1:18-OP-45662

*Means v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45470

*Warren v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45486

*Hunt v. Purdue Pharma L.P., et al.*  
MDL Case No. #1:18-OP-45681

*Peterson v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45472

*Carlson v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45487

*Hanlon v. Purdue Pharma L.P., et al.*  
MDL Case No. #1:19-op-45052

*Hampel v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45473

*Flach v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45488

*Doyle v. Purdue Pharma L.P., et al.*  
MDL Case No. #1:18-op-46327

*Whittaker v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45475

*Ivie v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45489

*Moore v. Purdue Pharma L.P., et al.*  
MDL Case No. #1:18-op-46305

*Tuttle v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45476

*Cherry v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45490

*Artz v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45459

*Hamawi v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45477

*Ortiz v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45492

*Rodriguez v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45463

*Gauthier v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45478

*Meinecke v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45493

*Brant v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45494

*Williams, v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45485

**MOTION FOR EXTENSION OF TIME**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(a) and Rule 15(a)(1)(B), counsel for NAS Plaintiffs in the above-captioned cases seek **a one day** extension of time to file amended complaints and produce completed, signed fact sheets pursuant to the Court's September 30, 2019 scheduling order. (Doc. # 2691.) Good cause exists for this brief extension request, and the brief delay would neither prejudice Defendants nor require extension of any other case management dates.

A court may grant an extension time for good cause shown, upon motion filed before the time has expired. Fed. R. Civ. P. 6(b)(1)(a). Despite the best efforts and undivided attention of NAS Plaintiff's counsel to the task of preparing amended pleadings, counsel anticipate that an extension of time may be necessary. Coordination and finalization of the amended pleadings has taken longer than anticipated due to the complexity of the differing state law issues and the necessary involvement of counsel in multiple states. Due to the importance of the matters at stake, and for the sake of judicial economy, NAS Plaintiff's counsel want to ensure that the amended pleadings will be finalized and perfected so as to minimize the need for further amendment.

NAS Plaintiff's counsel has consulted with counsel for Defendants prior to filing this motion in order to seek agreement, but Defendants oppose this brief extension request. However, the brief extension NAS Plaintiffs seek will not prejudice Defendants, as a one day extension would not cause unnecessary delay or require changing any other case management deadlines.

In sum, NAS Plaintiffs request that for good cause shown, the Court grant NAS Plaintiff's motion for an extension of time and reset the deadline for NAS Plaintiffs to file amended complaints and produce completed, signed fact sheets to October 8, 2019.

Respectfully submitted,

/s/ Marc E. Dann

Marc E. Dann (0039425)  
Emily C. White (0085662)  
Whitney E. Kaster (0091540)  
P.O. Box 6031040  
Cleveland, OH. 44103  
(216) 373-0539  
notices@dannlaw.com

*Counsel for NAS Plaintiffs*

/s/ Scott R. Bickford

MARTZELL, BICKFORD & CENTOLA  
Scott R. Bickford (La. 1165)  
Spencer R. Doody (La. 27795)  
338 Lafayette Street  
New Orleans, Louisiana 70130  
Telephone: 504-581-9065  
Email: srb@mbfirm.com;  
srd@mbfirm.com

*Counsel for NAS Plaintiffs*

/s/ Kent Harrison Robbins

THE LAW OFFICES OF KENT HARRISON  
ROBBINS, P.A.  
Kent Harrison Robbins (pro hac vice)  
242 Northeast 27th Street  
Miami, Florida 33137  
Telephone: (305) 532-0500  
Facsimile: (305) 531-0150  
Email: khr@khrlawoffices.com

*Counsel for NAS Plaintiffs*

/s/ Donald Creadore

THE CREADORE LAW FIRM, P.C.  
Donald Creadore (NY Reg. No. 2090702)  
450 Seventh Avenue – 1408  
New York, NY 10123  
Telephone: 212-355-  
7200  
Facsimile: 212-583-0412  
Email: Donald@creadorelawfirm.com

*Counsel for NAS Plaintiffs*

/s/ Celeste Brustowicz  
COOPER LAW FIRM, LLC  
Celeste Brustowicz (*pro hac vice*)  
Barry J. Cooper, Jr. (*pro hac vice*)  
Stephen H. Wussow (*pro hac vice*)  
Victor Cobb (*pro hac vice*)  
1525 Religious Street  
New Orleans, LA 70130  
Telephone: 504-399-0009  
Email: cbrustowicz@sch-llc.com

*Counsel for NAS Plaintiffs*

/s/ Kevin W. Thompson  
THOMPSON BARNEY LAW FIRM  
Kevin W. Thompson (*pro hac vice*)  
David R. Barney, Jr. (*pro hac vice*)  
2030 Kanawha Boulevard  
East Charleston, WV 25311  
Telephone: 304-343-4401  
Facsimile: 304-343-4405  
Email: kwthompsonwv@gmail.com

*Counsel for NAS Plaintiffs*

**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed via the Court's electronic filing system on October 4, 2019. Notice of this filing will be sent by e-mail through the Court's electronic case-filing system to all counsel of record.

/s/ Marc Dann  
Marc Dann